

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

CASE NO.: 3:17-bk-1497-JAF

IN RE: GERALD H. THOMPSON JR.
JUDY F. THOMPSON

Debtor(s)

NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST FOR HEARING

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within 30 days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the clerk of the Court at 300 North Hogan Street, Suite 3-150, Jacksonville, FL 32202 and serve a copy on the movant's attorney, D.C. Higginbotham, Esq., 925 Forest St., Jacksonville, FL 32204, and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing, or consider the response and grant or deny the relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

MOTION TO VALUE SECURED CLAIM 3-1

OF ALLY BANK

Comes now the debtor through her undersigned attorney, and shows as follows:

1. ALLY BANK is a creditor of the estate and holds a lien against the debtor's 2014 Ford F-250; VIN: 1FT7W2BT6EEB65867; Loan # 4891.
2. The creditor has filed a proof of secured claim in the amount of \$41,047.26.
3. The debtor believes that the value of the property securing the debt is less than the amount stated in the claim. The debtor believes the fair market value of the

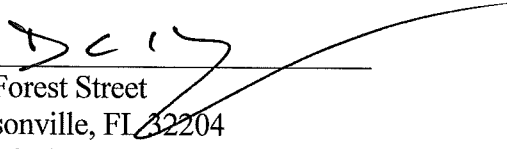
property to be \$34,650.

4. The vehicle that is the subject of the claim was acquired more than 910 days prior to the filing of this bankruptcy.

WHEREFORE, pursuant to 11 USC Section 506(a), the debtor moves the Court to value the secured claim so as to determine the amount thereof to be allowed as secured.

I HEREBY CERTIFY that a copy of the foregoing has been furnished electronically to ALLY BANK, Attn: Heather Lockman, signer of the claim, and Douglas W. Neway, Trustee, PO Box 4308, Jacksonville, FL 32201, this 27 day of September, 2017.

D. C. HIGGINBOTHAM, ESQUIRE



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Attorney for Debtor(s)